

Listing of all Immobilization and Euthanasia Drugs Reviewer Recommendations

Directives, Manuals, Operating Procedures (DMP)

- 1 WS should create policy or a revised WS Directive 2.340 to: 1) specifically identify the requirement for each state program to have veterinary supervision as required by FDA, 2) incorporate some form of accountability for meeting training requirements, and 3) revise I&E committee responsibilities which may be influenced by our safety recommendations relating to training.
- 2 WS Directive 2.340, Attachment 1. “WS Immobilization and Euthanasia Training Requirements”
This attachment should be updated to include the WS on-line as part of the certification program. Also some approved drugs, such as alpha-chloralose and propiopromazine have their own certification program and should be separated from the other I&E training requirements.
- 3 WS Directive 2.340, Attachment 2. “WS Approved I&E Agents”
The list should be rewritten to clearly identify which approved drugs are controlled substances.
- 4 Clarify, create, and/or enforce policies regarding: a) veterinary supervision of state I&E programs, b) holding and disposal of empty or expired drug vials, and c) transfer of I&E drugs.
- 5 Update the WS Field Manual as suggested.
- 6 Create a flexible policy or informative memo on recapping needles that recognizes the acceptability of diverse field practices but emphasizes safe protocols.
- 7 Create a policy or memo on transporting I&E drugs when transferring to and from field staff.
- 8 Standardize terminology and format for drug inventory forms. The exact format is less important than having the forms self-apparent, relatively standardized, and allow for the diversity of individual programs. As a result, we do not recommend a specific format, but recommend that the I&E committee create a small selection of forms with the input of state directors and others.

Management and Administration (MA)

- 1 Conduct unannounced, random, and physical (on-site) inspections of state programs to verify that requirements of drug storage and inventory documentation are met. This will effectively prevent potential drug abuses, sales, or loss and ensure that the legal requirements for DEA are met.
- 2 Require that DEA licenses for WS programs be issued to employees identified as Wildlife Services’ employees, not as personal agents.
- 3 Establish a policy or revised WS directive to: a) define the doctor-client-patient relationship between a WS state program and a supervising/consulting veterinarian, b) describe who is eligible to provide the veterinary supervision/consultation, and c) identify how the relationship is documented.
- 4 Increase accountability among administrators, state directors in particular, to ensure safety protocols are followed. This includes accountability for all I&E

policies, but in particular issues relating to drug inventories, storage, and documentation, veterinary supervision, and training requirements/certifications.

Training Program (TP)

- 1 Create or partner with an independent entity to a) evaluate the acceptability of training that is reported by employees and/or state directors and b) track employee training and certification. This same entity could be responsible for creating and delivering integrated, standardized and centralized training in the arena of I&E.
- 2 Empower an independent entity to track the certification status of employees and evaluate the acceptability of training reported by state directors and other employees to meet certification requirements. This same entity could be responsible for creating and delivering integrated, standardized, and centralized training in the arena of I&E. (same as TP-1)
- 3 Clarify the role of the online course toward meeting training requirements.
- 4 Standardize the format for reporting training events and opportunities, using input from state directors to determine the final form and function of this system.
- 5 Discontinue use of the blue card.

Equipment, Facilities and Maintenance (EFM)

- 1 Provide state programs with ideas or suggestions on products practical and effective as “sharps containers” in the field. This could be provided on the employee website.

Databases and Tracking Systems (SS)

- 1 Create an online clearinghouse of all I&E information pertinent to the WS program, including directives, policies, updates and memos, training curricula, technical information, and other pertinent resources.
- 2 Improve internet access availability and quality for all WS employees.
- 3 Creation of a separate accident reporting and tracking system for activities classified as “high risk”, such as I&E, so long-term trends can be easily monitored and compared with changing policies and practices to increase the level of safety over time.

Culture (C)

- 1 Ensure high quality of training that is available to all appropriate employees.
- 2 Create opportunities for isolated employees to work with others, either within the state or in an exchange program with other states.
- 3 Explore how to strengthen the culture (which already exists in many WS state programs) which acknowledges the importance of education, sharing of ideas among employees, and a conscientious attention to detail.
- 4 Explore the impact of how localized financial resources, responsibilities, and culture impact the function, communication and structure within some state programs. WS employees can be professional, educated, and detailed oriented and still blend with local communities.

- 5 Increase accountability among administrators, state directors in particular, to ensure safety protocols are followed. This includes accountability for all I&E policies, but in particular issues relating to drug inventories, storage, and documentation, veterinary supervision, and training requirements/certifications.